

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA	:	Case No. 2-24-CR-180
	:	
Plaintiff	:	JUDGE Sargus
	:	
v.	:	
	:	
JOEL BROWN	:	
	:	
Defendant	:	FILED UNDER SEAL

MOTION TO SEAL INDICTMENT

Now comes the United States, by and through its counsel, Assistant United States Attorney Nicole Pakiz, for the Southern District of Ohio, and respectfully requests that the Indictment and Arrest Warrant in the above-captioned cause be sealed because the United States is apprehensive that the defendant may flee the jurisdiction or that possibly other evidence may be destroyed if the defendant becomes aware of the existence of said Indictment.

WHEREFORE, the government respectfully requests that the Indictment and Arrest Warrants in this cause be sealed.

Respectfully submitted,

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